

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
A La Carte and Themed Programming and Pricing	)	MB Docket No. 04-207
Options for Programming Distribution on	)	
Cable Television and Direct Broadcast	)	
Satellite Systems	)	

**COMMENTS OF ADVANCE/NEWHOUSE COMMUNICATIONS**

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Dated: July 15, 2004

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Advance/Newhouse Communications,<sup>1/</sup> by its attorneys, hereby submits comments in response to the Commission's Public Notice released in the above-captioned proceeding on May 25, 2004.<sup>2/</sup>

**INTRODUCTION AND SUMMARY**

The instant proceeding is designed to assist policy-makers in ascertaining whether government intervention is required in connection with the manner in which cable programming services are offered to subscribers. Advance/Newhouse respectfully submits that such intervention would be both unnecessary and counter-productive.

Cable operators and other MVPDs have powerful incentives to preserve and enhance the value proposition associated with their service offerings. Video programming subscribers

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<sup>1/</sup> Advance/Newhouse is a privately held company owned by the Newhouse family with headquarters located in Syracuse, New York. Pursuant to its partnership with Time Warner Cable, Advance/Newhouse provides day-to-day management of cable systems serving 2.1 million subscribers in Florida, Alabama, Indiana, California, and Michigan operating under the name Bright House Networks (hereafter "Bright House Networks" or "BHN" systems). In addition to their cable interests, the Advance/Newhouse partners' other interests include Condé Nast Publications, a number of daily and weekly newspapers, and a 25% interest in Discovery Communications.

<sup>2/</sup> *In the Matter of A La Carte and Themed Programming and Pricing Options for Programming Distribution on Cable Television and Direct Broadcast Satellite Systems*, MB Docket No. 04-207, DA 04-1454 (May 25, 2004) ("Public Notice").

presently have a choice of at least four multichannel programming distributors in every local market where BHN provides service, and consumers continue to show greater willingness to switch between providers in order to obtain maximum value for their MVPD subscription service. To the extent that expanded a la carte and themed-tier offerings become a viable means of retaining and enhancing an MVPD's subscriber base, the intense competition between cable, DBS and other broadband service providers will ensure that consumers have ample opportunities to obtain programming services on that basis.

Advance/Newhouse has been in the cable business nearly forty years, and during that time has experimented with a variety of packaging and service delivery options – including offering multiple “mini-tiers” of satellite-delivered cable programming services and expanded a la carte offerings – as part of its ongoing effort to provide subscribers with maximum value for their cable subscription. Consistent with that objective, the company recently has deployed new services and capabilities that provide its subscribers with expanded opportunities to tailor their video programming service selections to meet their own particular tastes and interests. BHN subscribers can choose a number of new programming services and tier packages by opting for the company's digital service, have access to an array of new on-demand services, and can take advantage of the new digital video recorder capabilities offered by their system, in order to customize their viewing options and schedules.

While the proliferation of new service offerings made possible by digital technology is enhancing the ability of Bright House Networks' subscribers to exercise even more control over their video programming selections and purchases, the company's broad and diverse expanded basic cable package continues to be a highly popular service option. The breadth of the expanded basic package has played a critical role in the recruitment and retention of new

customers, by offering a large and diverse subscriber base access to a wide variety of programming content at an economical package price. Like most MVPDs, Bright House Networks offers its subscribers a diverse expanded basic tier not because it is forced to by programmers, most of whom lack the marketplace clout to dictate such a requirement, but because such an offering has proven to be immensely popular with subscribers. Indeed, complaints regarding the absence of specific networks from the expanded basic tier have been far more common in BHN's experience than complaints regarding the inclusion of too many networks.

Proposed government regulations designed to – either directly or indirectly – foster the unbundling or elimination of the expanded basic tier package would inhibit, or even preclude altogether, a cable operator from continuing to provide its most popular service offering to subscribers. Further, such intervention would eliminate a key engine of innovation and creativity in the video programming marketplace by depriving programmers of the opportunity to compete with one another to gain and retain a position in an MVPD's most popular tier package.

While new government regulation designed to alter or modify cable operators' expanded basic tier offering could have significant unintended adverse effects, it is, at best, unclear whether such intervention would demonstrably promote consumer choice or lower cable rates. By design, such regulations would appear to reduce the programming choices currently available to expanded basic tier subscribers, while forcing them to purchase or lease new equipment – such as addressable or digital converters – that would be necessary in order to block the receipt of programming services that were not selected. Further, by diminishing the ability of programmers to bargain for a particular tier placement or critical mass of subscriber penetration necessary to ensure a viable advertising revenue stream, such regulations would have an upward

effect on the per-channel rates paid for programming by MVPDs. Such proposals also would hamper the emergence of new programming services, which both promote diversity and put downward pressure on wholesale programming prices. In addition, government regulations aimed at promoting a la carte offerings also would raise a number of technical, marketing, and operational issues for MVPDs that would have the effect of putting upward pressure on rates. Accordingly, the Commission should examine carefully the data generated in this proceeding, and be particularly mindful of the potential for adverse, unintended consequences that might arise from a conclusion that market forces are insufficient to determine and deliver the optimal level of a la carte and themed-tier offerings to subscribers.

**I. MARKET FORCES SHOULD CONTINUE TO DETERMINE THE MANNER AND MEANS BY WHICH VIDEO PROGRAMMING SERVICES ARE OFFERED TO MVPD SUBSCRIBERS**

The fundamental question underlying the instant proceeding is whether market forces or government regulation should determine the manner and means by which video programming services are offered to consumers. Key members of Congress have asked the Commission to gather information and submit a report concerning the efficacy of providing a la carte and themed-tier services to cable and satellite subscribers.<sup>3/</sup> The report is aimed at facilitating Congress' ability "to make an informed decision on the potential merits and drawbacks of proposals which would allow or require multichannel video programming distributors (MVPDs) to offer programming on an *a la carte* or themed-tier basis."<sup>4/</sup>

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<sup>3/</sup> See Letter from Congressmen Joe Barton, John D. Dingell, Fred Upton, Edward Markey, and Nathan Deal, members of U.S. House of Representatives Committee on Energy and Commerce, to Michael K. Powell, Chairman of the Federal Communications Commission, at 1 (May 18, 2004) ("*House Letter*"); Letter from Senator John McCain, Chairman, U.S. Senate Committee on Commerce, Science, and Transportation to Michael K. Powell, Chairman of the Federal Communications Commission (May 19, 2004); see also Public Notice at 1.

<sup>4/</sup> *House Letter* at 1.

Facing intense competition from at least three MVPDs in every local market where it offers service – as well as from wireline overbuilders in some markets and new Internet-based video programming offerings from companies including Starz, Real Networks, Microsoft and the major studios<sup>5/</sup> –, BHN has every incentive to explore and offer new ways of delivering value to subscribers. Because maximizing subscriber value is key to both customer retention and revenue growth in an increasingly competitive marketplace, cable operators cannot afford to overlook any potential opportunity for enhancing consumer choice and strengthening the ability of subscribers to obtain the most for their money. To that end, during the four decades it has been in the cable business, Advance/Newhouse has experimented with “mini-tiers” of satellite-delivered cable programming services and expanded a la carte offerings on some of its systems.

While the subscriber response to those experiments was, at best, mixed, the company’s broad and diverse expanded basic package has a consistent track record of promoting subscriber recruitment and retention. The expanded basic package offered by Bright House Networks to its subscribers – known as standard service – is designed specifically to promote the business objectives of maximizing subscriber choice and value.<sup>6/</sup> Subscribers have access to over fifty satellite-delivered cable programming networks at an average per-channel rate which is many times less than the rate for a la carte services carried on the system. The breadth and diversity of the standard service package offers subscribers a rich array of news, sports, children’s, family, educational, music, minority and women’s, and general entertainment programming services. Offering cable subscribers a diverse mix of content choices in a single package mirrors

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<sup>5/</sup> Mike Lanberg, *Online Movies Take Step Forward*, San Jose Mercury News, July 1, 2004 (describing Starz/Real Networks online movie offering); Mai Hoang, *Big Stars, Little Screen*, Orlando Sentinel, June 23, 2004 (describing Starz/Real offering, Movielink online movie service from major studios, and CinemaNow online movie service partially owned by Microsoft); John Markoff, *New Service by TiVo Will Build Bridges from Internet to the TV*, New York Times, June 9, 2004.

<sup>6/</sup> Representative channel line-ups for two Bright House Networks systems are included as Exhibits 1 and 2.

marketing models employed by newspapers, magazines, and over-the-air television broadcasters – as well as newer content businesses such as satellite radio and Internet service providers –, each of which seeks to attract a broad and diverse customer base by making available a wide variety of content in a single, packaged offering.

Cable operators and other MVPDs offer a diverse expanded basic tier because it has proven to be immensely popular with subscribers, and not because the furnishing of such a package has been dictated by programmers. The near-tripling of nationwide cable penetration from 22% to 61% during the period in which a tier of satellite-delivered, advertiser-supported cable programming services first became available to subscribers, is a testament to the appeal and value of that package.<sup>7/</sup> Throughout much of the 1990s, cable operators had a strong regulatory and financial incentive to unbundle the expanded basic tier and offer more services on an a la carte basis, since such services were exempt from rate regulation under the Cable Television Consumer Protection and Competition Act of 1992.<sup>8/</sup> Despite this strong financial and regulatory incentive, there was not a marked expansion in the provision of advertiser-supported satellite services on an a la carte basis, thereby indicating the limited popular and business appeal of that approach. It is noteworthy that DBS providers also offer a broad package of satellite-delivered cable services, despite the fact that all of their signals are transmitted digitally, thereby mitigating many of the costs and technical difficulties of providing expanded a la carte offerings.

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<sup>7/</sup> See *In the Matter of Amendment of Part 76 of the Commission's Rules Concerning Carriage of Television Broadcast Signals by Cable Television Systems*, 1 FCC Rcd 864 ¶ 134, Table 1 (1986) (listing 1980 nationwide cable penetration as 22%); H. Rep. No. 102-628, at 29 (June 29, 1992) (noting June 1992 cable penetration of 61%).

<sup>8/</sup> See 47 U.S.C. § 543(l)(2).



With the exception of cable networks whose carriage terms are linked to licensing arrangements for affiliated programming services with market power – such as broadcast networks and regional sports services –,<sup>9/</sup> most cable programming services lack the inherent ability to force their way into the expanded basic package. Thus, new government regulations applicable to the entire universe of cable programming services and aimed at forcing operators and programmers to unbundle expanded basic tier offerings are unnecessary. Such regulations, however, could have the unintended consequence of hampering the ability of cable operators to continue to offer their subscribers a programming service package which, for decades, has proven to be extremely popular with consumers.

Most BHN subscribers enjoy having the opportunity to access a wide range of diverse programming options via a single tier package. It is far more common for the company to receive requests from subscribers that programming services be added to the standard service tier, rather than subtracted. For instance, programming networks such as the History Channel, the Learning Channel, Arts and Entertainment Network, and others became part of the expanded basic package on BHN systems in response to strong subscriber demand for those services. In that regard, the content of the standard service package is not static. New programming services are added to the package in response to subscriber demand and other business considerations, while some networks may be dropped or moved to other tiers.

The opportunity for programmers to compete for a spot on the expanded basic package represents an important source of marketplace innovation and creativity. Programmers work to

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<sup>9/</sup> See, e.g., *In the Matter of General Motors Corp. and Hughes Corp., Transferors, and The News Corp. Limited, Transferee*, MB Docket No. 03-124, FCC 03-330, ¶ 201 (rel. Jan. 14, 2003) (“News Corp. currently possesses significant market power in the DMAs in which it has the ability to negotiate retransmission consent agreements on behalf of local broadcast television stations. Local broadcast station programming is highly valued by consumers, and entry into the broadcast station market is difficult”); *id.* ¶ 147 (“News Corp. currently possesses significant market power with respect to its RSNs within each of their specific geographic regions”).

improve and enhance the content and marketing of their offerings in order to gain or retain carriage on cable operators' most popular tier of service. Regulatory proposals that would deter such competition – by mandating that all cable programmers make their services available for license on an a la carte basis – would deprive the marketplace of a key engine of innovation and diversity.

While the expanded basic package continues to be one of BHN's most popular service offerings, the company also has taken several steps to enhance the ability of subscribers to tailor their video programming choices more closely to their specific interests and needs. Bright House Networks' digital offerings include a wide array of on-demand programming, a new digital sports cluster, and a digital video recorder (DVR) option that enables subscribers to watch programming of particular interest to them according to their schedules. Further, like many other cable operators, most new advertiser-supported programming services being added by BHN are being launched on a digital tier,<sup>10/</sup> thereby mitigating upward pricing pressure on expanded basic.

While MVPD subscribers are being offered new options that provide them with greater flexibility in service selection and expanded choice, many customers would likely greet a reduction in the breadth and diversity of the expanded basic tier with dismay and confusion. Consumers not only enjoy having access to a diverse range of programming choices, they also “place value in having the opportunity to occasionally watch networks they typically do not watch.”<sup>11/</sup> Many subscribers also enjoy the economy and convenience of being able to obtain access to this broad range of services without the need for a converter box, an option that would

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<sup>10/</sup> See Akweli Parker, *A La Carte Cable Pricing Is a Looming Problem for Start-Up Channels*, Philadelphia Inquirer, June 10, 2004 (noting that almost all recent cable network additions have been made to digital tiers).

<sup>11/</sup> U.S. General Accounting Office, *Telecommunications: Issues Related to Competition and Subscriber Rates in the Cable Television Industry*, at 37 (Oct. 2003) (“GAO Report”), available at <http://www.gao.gov/new.items/d048.pdf>.

not be possible in an environment in which some or all of the current cable program network staples in the expanded basic package were provided on an a la carte basis.<sup>12/</sup> Because regulations aimed at expanding a la carte offerings of advertiser-supported cable networks would likely reduce the audience being reached by many networks, they also would erode the subscribership and advertising revenues on which such networks depend for their survival.<sup>13/</sup> The General Accounting Office (GAO) confirmed this likely result in a recent study, noting that cable networks and financial analysts with which it spoke believed that the lost subscribership, in addition to the direct loss of subscribership fees, could “result in a reduced amount that advertisers are willing to pay for advertising time.”<sup>14/</sup> Moreover, the networks most likely to be affected by this decrease in revenues are those least able to withstand the blow – fledgling or niche networks offering unique content.<sup>15/</sup> Thus, “a la carte schemes, whether for all services or just directed at a particular genre will only . . . produce less choice and the extinction of many channels that serve specific, but important audiences,”<sup>16/</sup> such as children and minorities.<sup>17/</sup>

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<sup>12/</sup> See Raymond L. Katz, Katie Manglis, Gloria Radeff, Bear Stearns, *A La Smart?*, at 6 (Mar. 29, 2004) (“*Bear Stearns Report*”); Crain Communications, *Mandating A La Carte Is Not the Way to Go*, April 5, 2004 (noting that subscribers who might be drawn to a la carte by the prospect of cost savings also may be the ones who have chosen not to obtain converter boxes due to cost concerns)

<sup>13/</sup> National Cable & Telecommunications Association Policy Paper, *The Pitfalls of A La Carte: Fewer Choices, Less Diversity, Higher Prices*, at 9-12 (May 2004) (“*NCTA A La Carte Paper*”).

<sup>14/</sup> *GAO Report* at 35-36.

<sup>15/</sup> *Id.* at 35; *A La Carte Cable TV Suggested But Critics Say Consumers Wouldn’t See Lower Rates*, San Jose Mercury News, March 29, 2004 (Wayne Brough Chief Economist for Citizen for a Sound Economy stated “the market gives consumers what they want better than a regulated cable industry . . . it’s the niche channels that would get hurt because they would never get broadcast.”).

<sup>16/</sup> See e.g., Statement of George Bodenheimer, President ESPN Inc. and ABC Sports before the Senate Commerce Committee, March 8, 2004; see also Amey Stone, *Why Your Cable Bill Is Soaring*, Business Week Online, Apr. 26, 2004 (asserting that “the result [of a la carte] would be less niche programming . . . and a smaller number of homogenous networks” and “people would end up paying more money for less content”).

<sup>17/</sup> See, e.g., Letter from Judith McHale, President and Chief Operating Officer, Discovery Communications, Inc. to Members of the Senate Committee on Commerce, Science, and Transportation (Mar. 8, 2004) (explaining that a la carte would result in the demise of exactly the type of family friendly

Customer dissatisfaction arising from the loss of program diversity associated with the reduction or elimination of today's expanded basic package may well more than offset any boost to consumer welfare experienced by those subscribers interested in expanded a la carte purchasing opportunities.<sup>18/</sup>

## **II. THERE IS NO BASIS FOR CONCLUDING THAT GOVERNMENT INTERVENTION AIMED AT EXPANDING A LA CARTE OFFERINGS WOULD YIELD SUBSCRIBER RATE REDUCTIONS**

There is little dispute that government regulations that diminish the ability of programmers to bargain for tier placement or a guaranteed level of subscriber penetration sufficient to support a viable advertising revenue stream, would put upward pressure on the wholesale programming rates paid for cable networks by MVPDs.<sup>19/</sup> Wholesale programming rates would almost certainly rise because a la carte would cause the number of subscribers to decrease and consequently the amount of advertising revenues to decrease (because of the lesser

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programming the Committee seeks to foster and that it would make it “untenable for Discovery to produce the kind of high quality, informative, and educational programming the American public deserves”); Alfred Liggins, Editorial, *Destroying Diversity*, Wash. Times, Apr. 12, 2004, at A21 (noting that a la carte would “have a chilling effect on programming diversity in America” and could put innovative networks like TV One, which tailors programming for African American adults out of business); Ted Hearn, *A La Carte Off the Menu; House Hands A Hot Potato Over to FCC*, Multichannel News, May 24, 2004 (noting that the “most vocal” opponent of a la carte in Congress appears to be the Congressional Black Caucus, every member of which signed a letter to Reps. Barton and Dingell explaining the dangers posed by a la carte for “cable networks that cater to minority audiences.”).

<sup>18/</sup> See *Canadian Says A La Carte Isn't All It's Cracked Up to Be*, Satellite Week, July 5, 2004 (noting statement by Canadian Cable TV Association President Michael Hennessy that “a la carte is failing in Canada and residents north of the border are envious of the choices available to Americans”).

<sup>19/</sup> See, e.g., *GAO Report* at 34-36 (“If cable subscribers were allowed to choose networks on an a la carte basis, the economics of the cable industry could be altered, and if this were to occur, it is possible that cable rates could actually increase for some consumers” because of decreased advertising fees that might result in higher license fees); *Bear Stearns Report* at 4-5 (“[w]e believe a la carte take-rates would be considerably lower than the current 100% distribution for most basic networks . . . . [a]nd the lower the penetration, the lower the advertising revenue and the higher the affiliate fee necessary to recoup the lost distribution revenue”); Michael Grebb, *The Political Endurance Test: Offering Channels in Family Friendly Tiers – or One by One – Could Be the Death Knell for Some*, Multichannel News, May 17, 2004 (noting that “[b]ecause small tiers would have fewer viewers, the cable industry argues that advertisers would demand lower rates . . . . [which] would eventually put upward pressure on license fees, which would trickle down to consumers” and that “it’s not just the cable industry that forecasts advertising doom” but also the GAO and programmers).

audience) while the cost of producing the programming would remain the same unless programmers chose to decrease quality in order to recoup some revenues. The remaining subscribers thus would have to bear the brunt of the loss of the advertising and subscriber revenues, which would result in much higher per-channel rates.<sup>20/</sup>

To the extent that government regulations spurred a reduction or meltdown of expanded basic tiers offered by MVPDs and required more programmers to license their networks on a standalone basis, there is no basis for concluding that such a change in industry practice would have a favorable impact on retail rates paid by subscribers. Because each affected network would most likely be required to increase its license fee to maintain license fee revenue on a neutral basis to offset lower distribution, retail per-channel rates paid by subscribers would almost certainly rise. A cable subscriber opting to maintain the same level of service presently offered on a bundled basis likely would pay a higher retail rate if some or all of those services were offered on an a la carte basis. A consumer choosing to pay the same monthly rate presently being incurred would likely receive fewer services for that same retail rate. Further, a subscriber choosing to reduce his or her monthly fee would pay more per channel and receive significantly less programming. Indeed, a Bear Stearns economic modeling of a la carte processing concluded that a subscriber choosing five popular services (specifically, the Disney Channel, ESPN, MTV, Fox News, and TBS) could actually pay more to obtain those five services on a la carte basis than to obtain those services plus numerous other services on a tiered basis.<sup>21/</sup>

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<sup>20/</sup> GAO Report at 36 (“Because increased license fees, to the extent they occur, are likely to be passed on to subscribers, it appears that subscribers’ monthly cable bills would not necessarily decline under an a la carte system); Ted Hearn, *Chorus Chant: A La Carte’s Bad; Nary a Dissenting (Cable) Voice to A La Carte Pricing Opposition Effort*, Multichannel News, May 10, 2004 (noting concerns that “a la carte would cause rates to soar because cable networks that lost advertising revenue would have to recover it through higher license fees, which inevitably get passed along to subscribers.”).

<sup>21/</sup> Bear Stearns Report at 4.

Artificial expansions in a la carte offerings would put upward pressure on retail cable prices in other respects besides wholesale programming rates. A significant portion of a subscriber's monthly cable bill reflects the fixed cost of delivering cable programming service to customers, and if those non-variable costs are spread over a smaller number of channels, the retail per-channel rate for programming inevitably will rise. In addition, head-end and security costs would increase due to the need to procure additional scrambling and encryption devices in order to ensure that a la carte networks are transmitted only to standalone purchasers of such services.<sup>22/</sup> More subscribers would need to obtain addressable or digital set-top boxes in order to view newly encrypted signals, thereby diminishing the number of cable customers that are able to obtain service without leasing a converter box.<sup>23/</sup>

In addition, customer service and technical personnel would require extensive and ongoing training regarding the new a la carte options<sup>24/</sup> and what would likely be an ever-changing array of prices and options as a la carte channels gain or lose popularity. Similarly, new billing and operational procedures and programs would have to be developed in order to

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<sup>22/</sup> See *GAO Report* at 32 (“If all networks were offered on an a la carte basis, cable operators would need to scramble all of the networks they transmit to ensure that subscribers are unable to view networks they are not paying to receive.”).

<sup>23/</sup> *GAO Report* at 32 (noting that a la carte would require subscribers to obtain set-top boxes to unscramble the signals that the subscriber has agreed to purchase and the need for such boxes could be “costly.”); *Bear Stearns Report* at 4 (noting that a la carte would result in charges for truck rolls (traps) or capital costs (set-top boxes), increased marketing and customer service (dealing with customer requests), billing and systems integration, and regulatory costs); *Mandating A La Carte, Distribution or “Family-Friendly” Tiering of Cable Networks Will Reduce Program Diversity and Increase Costs for Consumers*, NCTA, at 2 (Apr. 2004) (noting that for “the tens of millions of customers who rely on cable ready television sets to view basic and expanded tier programming, the cost of leasing or purchasing addressable set-top boxes is estimated to be \$4.39 per box” and the monthly rate impact would be higher for households with multiple sets).

<sup>24/</sup> See *GAO Report* at 33 (“In addition to the subscriber costs of converter boxes, cable operators also would incur costs to monitor and manage an a la carte approach. Cable operators likely would have to add additional customer service and technical staff to deal with the increased number of transactions that would occur under an a la carte regime” and the lengthier call times stemming from the additional programming choices); *Bear Stearns Report* at 4 (predicting increased customer service and marketing costs).

contend with the far more complex ordering options that would be allowed by a la carte.<sup>25/</sup>

Indeed, the sheer complexity of the ordering options and pricing is likely to cause substantial consumer confusion and irritation, resulting in additional costs to the cable network of dealing with the consequent rise in consumer calls and/or complaints.<sup>26/</sup>

## CONCLUSION

For the foregoing reasons, Advance/Newhouse urges the Commission to submit a report that reiterates the superiority of market forces – and the potential drawbacks of new government regulation – in determining the manner and means by which cable programming services are offered to subscribers.

Respectfully submitted,

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Dated: July 15, 2004

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<sup>25/</sup> See Bobby White, *Consumer Angst Over Rising Rates Has Popped Up as an Election Year Issue, But There Won't be Quick Fixes*, Knight Ridder Newspapers, May 9, 2004 (citing cable operator's concern that "an a la carte cable menu would overthrow the cable billing system . . . [n]ew equipment would have to be purchased and installed . . . which could cost billions of dollars.").

<sup>26/</sup> NCTA A La Carte Paper at 16-17; GAO Report at 33.

## CERTIFICATE OF SERVICE

I, Laura Rychak, hereby certify that on this 15th day of July, 2004, the foregoing Comments of Advance/Newhouse Communications were filed electronically on the FCC's Electronic Comment Filing System and electronic copies were served via electronic mail to the following:

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**bright  
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NETWORKS

## Important information about your Bright House

Hillsborough F15373

### Dear Valued Customer,

Thank you for being a Bright House customer.

Over the past year, we've continued to enhance our products and services to provide you with the highest quality choices and value in cable. Whether it was investing more in customer service or upgrading our equipment, we've worked hard to meet your needs and deliver quality entertainment and information services you've come to expect. One of the first things we did, as a new company, was to roll back the prices on our digital and digital online plans. Customers in these plans received savings up to \$26.65 per month. This year, we have made the smallest rate adjustment in years in the Tampa Bay area. In fact, many of our customers will not be affected by the adjustment at all, and the average increase for all our customers is less than 2% since January of last year.

#### Some other bright Ideas for you!

- Our new Digital Video Recorder lets you command and control live TV. With a DVR you can pause a show and start it up again at your convenience, or record it to watch later.
- If you have an HDTV set or are thinking of getting one, you are going to love your new HDTV lineup. There are nine HD channels including four local channels and two IN Demand High Definition variety channels, not available with satellite.
- You can now choose among three great new digital tiers: the Sports Pak, the HD Pak and Nuestros Canales. We've also added new digital programming including Soap Net, Biography and History International.
- You now have more options. HBO, Showtime, Cinemax and The Movie Channel are all available "On Demand." So you can watch movies and shows on your schedule.

Are you aware we introduced new digital and digital/online plans that offered many of our customers the opportunity to subscribe to digital cable and high-speed online service, and to save money? If you haven't heard about our digital/online plans, give us a call. We'll help you find a package that works for you.

The costs to provide you these new benefits, and to continue to improve our service, have risen over the past year and, in January 2004, some new prices will become effective. At Bright House Networks, we know how important it is to provide value to our customers. That is why, as we said above, we have made this adjustment the smallest in years.

Coming up in the new year, we'll be doing even more to provide the best service and products of any digital cable and high-speed provider anywhere. And we plan to introduce even more new products and new entertainment plans.

2003 has been an exciting year, and it's going to be even more exciting in the year to come. We're looking forward to spending 2004 with you, and we appreciate having you as a customer.

Bright House Networks

Take your family entertainment to a new level

## Your Channel Lineup

### Limited Basic Service

2	WEDU CH. 3 PBS
3	WCLF CH. 22 IND
4	WTOG CH. 44 UPN
5	WFTT CH. 50 TELEFUTURA
6	WTLA CH. 38 WB
7	WFLA CH. 8 NBC
8	WVEA CH. 62 UNIVISION
9	BAY NEWS 9
10	WTSP CH. 10 CBS
11	WFTS CH. 28 ABC
12	WMOR-TV CH. 32
13	WRMD CH. 57 TELEMUNDO
14	WTVT CH. 13 FOX
15	CTTV (CITY OF TAMPA TELEVISION)
16	WUSF CH. 16 PBS
17	WXPX CH. 66 PAX
18	EDUCATION CHANNEL
19	PUBLIC ACCESS 2 (CITY)
20	PUBLIC ACCESS
21	BET (COUNTY)
21	EDUCATION CHANNEL 2 (CITY)
22	GOVERNMENT ACCESS
23	TBS (ATLANTA)
24	WGN (CHICAGO)
25	C-SPAN
98	SHOP NBC
99	HSN

### Preferred Value Package

(Includes Limited Basic Service)

26	TNT
27	ESPN
28	ESPN2
29	CNN
30	HEADLINE NEWS
31	SUNSHINE NETWORK
32	USA NETWORK
33	THE WEATHER CHANNEL
34	DISCOVERY CHANNEL
35	ANIMAL PLANET
36	NICKELODEON
37	FOX NEWS
38	LIFETIME
39	FOX SPORTS NETWORK
40	DISNEY CHANNEL
41	MSNBC
42	CNBC
43	SPIKE TV
44	OXYGEN
45	COUNTRY MUSIC TV
46	THE LEARNING CHANNEL
47	BRIGHT HOUSE CHANNEL 47
48	A&E (ARTS & ENTERTAINMENT)
49	QVC
50	THE HISTORY CHANNEL
51	C-SPAN 2/EI ENTERTAINMENT
52	ABC FAMILY
53	TURNER CLASSIC MOVIES
54	THE TRAVEL CHANNEL
55	COURT TV
56	FOOD NETWORK
57	HOME & GARDEN TV
58	CARTOON NETWORK
59	SCH-FI
60	FX
61	COMEDY CENTRAL
62	MOVIE PLEX
63	FLIX
64	AMERICAN MOVIE CLASSICS
65	VH-1
66	MTV
67	THE GOLF CHANNEL
68	HALLMARK CHANNEL
69	WE
70	BRAVO
71	NATIONAL GEOGRAPHIC
72	DISCOVERY HEALTH (COUNTY)
72	BET (CITY)
73	LIFETIME MOVIE NETWORK
74	OUTDOOR LIFE NETWORK
75	TV LAND
76	EWTV
77	LEASED ACCESS
78	ESPN CLASSIC SPORTS

### Digital Channels

1	<b>Movies On Demand</b>
100	THE SCIENCE CHANNEL
101	HISTORY INTERNATIONAL
102	DISCOVERY KIDS
103	DISCOVERY WINGS
104	BIOGRAPHY
105	DIGITAL DISNEY
106	OVATION
107	BET JAZZ
108	DISCOVERY HOME & LEISURE
109	BAY NEWS 9 WEATHER NOW
110	AMERICA'S STORE
111	FINE LIVING
112	SPEED CHANNEL
113	INDEPENDENT FILM CHANNEL
114	HEALTH NETWORK
115	FLIX WEST
116	GAME SHOW NETWORK
117	SUNDANCE
118	CNN m
119	STYLE
120	FOX SPORTS WORLD
121	ESPNEWS
122	TOON DISNEY
123	BBC AMERICA
124	G4
125	NOGGIN
126	MTV2
127	BLOOMBERG
128	NEWSWORLD INTERNATIONAL
129	C-SPAN 3
130	TRIO
131	TRINITY BROADCASTING NETWORK
132	FUSE
133	GREAT AMERICAN COUNTRY
134	GOODLIFE TV
135	DISCOVERY TIMES
136	diy - DO IT YOURSELF
137	SOAPnet
138	VH1 CLASSIC
139	BAY NEWS 9 EN ESPAÑOL
140	GAMES AND SPORTS FOR KIDS
141	CNBC WORLD
142	TECH TV
143	LIFETIME REAL WOMEN
995	DIGITAL HELP CHANNEL

### Digital Movie Tier

192	FOX MOVIES
193	ENCORE
194	ENCORE LOVE STORIES
195	ENCORE WESTERNS
196	ENCORE MYSTERY
197	ENCORE ACTION
198	ENCORE TRUE STORIES
199	ENCORE WAM FOR KIDS

### Digital Premium Services

200	<b>HBO ON DEMAND</b>
201	HBO
202	HBO2
203	HBO SIGNATURE
204	HBO FAMILY
205	HBO COMEDY
206	HBO ZONE
207	HBO LATINO
208	HBO WEST
209	HBO2 WEST
210	HBO SIGNATURE WEST
211	HBO FAMILY WEST
212	HBO COMEDY WEST
213	HBO ZONE WEST
214	HBO LATINO WEST
220	<b>CINEMAX ON DEMAND</b>
221	CINEMAX
222	MORE MAX
223	ACTION MAX
224	THRILLER MAX
225	WMAX
226	@MAX
227	5STAR MAX
228	OUTER MAX
229	CINEMAX WEST
230	MORE MAX WEST
231	ACTION MAX WEST
232	THRILLER MAX WEST
240	<b>SHOWTIME ON DEMAND</b>
241	SHOWTIME
242	SHOWTIME TOO
243	SHOWTIME SHOWCASE
244	SHOWTIME WOMEN
245	SHOWTIME BEYOND
246	SHOWTIME NEXT
247	SHOWTIME EXTREME
248	SHOWTIME FAMILY ZONE
249	SHOWTIME WEST
250	SHOWTIME TOO WEST
251	SHOWTIME SHOWCASE WEST
252	SHOWTIME WOMEN WEST
253	SHOWTIME BEYOND WEST
254	SHOWTIME NEXT WEST
255	SHOWTIME EXTREME WEST
256	SHOWTIME FAMILY ZONE WEST

### THE MOVIE CHANNEL ON DEMAND

261	THE MOVIE CHANNEL
262	THE MOVIE CHANNEL XTRA
263	THE MOVIE CHANNEL WEST
264	THE MOVIE CHANNEL XTRA WEST
271	STARZ!
272	STARZ! THEATER
273	BLACK STARZ!

274	STARZ! FAMILY
275	STARZ! CINEMA

### Digital IN DEMAND™ PPV

300	IN DEMAND PREVIEW CHANNEL
301-330	IN DEMAND 1-30
331	HOT CHOICE
390	ICONTROL
	ADULT ON DEMAND
396	PLEASURE
397	PLAYBOY
398	SPICE 2
399	SPICE
500	SPORTS PACKAGE PREVIEWS
510	ESPN NOW
511-515	ESPN GAME PLAN/ ESPN FULL COURT
519	SUNSHINE NETWORK COLLEGE FOOTBALL
520	NBA LEAGUE PASS PREVIEW CHANNEL
521-531	NBA LEAGUE PASS
541-550	NHL CENTER ICE/ MLB EXTRA INNINGS
551-557	NASCAR IN CAR
571-574	MLS SHOOTOUT

### Digital Music

400	MUSIC CHOICE PREVIEWS
401	SHOWCASE
402	TODAY'S COUNTRY
403	CLASSIC COUNTRY
404	AMERICANA
405	BLUEGRASS
406	R&B AND HIP-HOP
407	CLASSIC R&B
408	SMOOTH R&B
409	RAP
410	METAL
411	ROCK
412	POWER ROCK
413	CLASSIC ROCK
414	ALTERNATIVE ROCK
415	ELECTRONICA
416	DANCE
417	PROGRESSIVE
418	SOFT ROCK
419	HIT LIST
420	PARTY FAVORITES
421	'80S
422	NEW WAVE
423	'70S
424	SOLID GOLD OLDIES
425	SINGERS & STANDARDS
426	BIG BAND & SWING
427	EASY LISTENING
428	SMOOTH JAZZ
429	JAZZ
430	BLUES
431	REGGAE
432	SOUNDSCAPES
433	CLASSICAL MASTERPIECES
434	OPERA
435	LIGHT CLASSICAL
436	SHOW TUNES
437	CONTEMPORARY CHRISTIAN
438	GOSPEL
439	FOR KIDS ONLY
440	SOUNDS OF THE SEASONS
441	MUSICA LATINA
442	SALSA MERENGUE
443	ROCK EN ESPAÑOL
444	LATIN LOVE SONGS
445	MEXICANA

### Digital/HDTV Channels

603	WEDU - DIGITAL PBS
604	WEDU - PBS KIDS/FL NEWS
605	WEDU - DT PBS
610	WTSP - DT CBS
613	WTVT - DT FOX
628	WFTS - DT ABC
690	DISCOVERY HD THEATER

### Premium HD Channels

700	HBO HD
701	SHOWTIME HD

### HD PAK

703	INHD
704	INHD 2

### Sports PAK

800	FOX SPORTS ATLANTIC
801	FOX SPORTS CENTRAL
802	FOX SPORTS PACIFIC
803	NBA TV
804	TENNIS CHANNEL
805	THE OUTDOOR CHANNEL
806	FUEL

### Nuestros Canales

900	BAY NEWS 9 EN ESPAÑOL
901	SUR
902	CNN EN ESPAÑOL
903	DISCOVERY EN ESPAÑOL
904	FOX SPORTS EN ESPAÑOL
905	MTV ESPAÑOL
906	MUN2

# CHANNEL LINEUP

ORANGE - Effective 1/1/04

1	WBCC/VCC (Ind) Cocoa-68	B
2	WMFE (PBS) Orlando-24	B
3	WOFL (FOX/Ind) Orlando-35	B
4	WESH (NBC) Daytona Beach-2	B
5	WKMG (CBS) Orlando-6	B
6	WRBW (UPN/Ind) Orlando-65	B
7	WFTV (ABC) Orlando-9	B
8	WKCF (WB/Ind) Clermont-18	B
9	Government Access	B
10	Bright House-10	S
11	TNT	S
12	TBS	S
13	Central Florida News13	S
14	WACX (Ind) Leesburg-55	B
15	WCEU (PBS) Daytona-15	B
16	WOPX (PAX) Orlando-56	B
17	WOFL (TeleFutura) Melb-43	B
18	WVEN (Univision) Orlando-26	B
19	WLCB (Ind) Leesburg-45	B
20	WGN (Ind) Chicago	B
21	WRDQ (Ind) Orlando-27	B
22	WTGL (Ind) Cocoa-52	B

## NEWS & INFO

23	CNN Headline News	S
24	CNN	S
25	CNBC	S
26	MSNBC	S
27	The Weather Channel	S
28	FOX News	S

## SPORTS

29	ESPN	S
30	ESPN2	S
31	Sunshine Network	S
32	Speed Channel	S

## CHILDREN/FAMILY

33	QVC	S
34	Nickelodeon	S
35	Disney Channel	S
36	Cartoon Network	S
37	WE	S
38	TV Land	S
39	USA Network	S
40	Lifetime	S
41	The Discovery Channel	S
42	A&E	S
43	The History Channel	S
44	Animal Planet	S
45	The Learning Channel	S
46	Turner Classic Movies	S
47	American Movie Classics	S

## VARIETY

48	HBO	P
49	Zap2it	S
53	Showtime	P
54	SOAPnet	S
55	Lifetime Movie Network	S
56	The Travel Channel	S
57	Bravo	S
58	The Golf Channel	S
59	Food Network	S
60	Court TV	S
61	HGTV	S
62	Telemundo	S
63	Galevision	S
64	Oxygen	S
65	E! Entertainment Television	S

66	Comedy Central	S
67	BET	S
68	Spike TV	S
69	C-SPAN	S
70	FX	S
71	CMT	S
72	VH1	S
73	MTV	S
74	SCI FI Channel	S
75	ShopNBC	S
76	Home Shopping Network	S
77	Hallmark Channel	S
78	Discovery Health	S
79	MOVIEplex	P
98	Government Channel	B

## ICONTROL VIDEO ON DEMAND

119	TMC on Demand	ICP
120	SHO on Demand	ICP
121	MAX on Demand	ICP
122	HBO on Demand	ICP
123	ICONTROL Movies on Demand	ICD

## DIGITAL NEWS & INFO

113	News13 Weather Now	DPP
124	CNNn	DPP
125	CNBC World	DPP
126	Bloomberg TV	DPP

## DIGITAL SPORTS

127	ESPN Now	DPP
128	FOX Sports World	DPP
129	ESPN Classic	DPP
131	ESPNes	DPP

## DIGITAL CHILDREN & FAMILY

132	PBS Kids Channel	DPP
133	GAS	DPP
134	Noggin	DPP
135	Toon Disney	DPP
137	ABC Family	DPP
139	Discovery Kids	DPP

## DIGITAL VARIETY

140	Lifetime Real Women	DPP
141	The Science Channel	DPP
142	Discovery Wings	DPP
143	Discovery Times	DPP
145	National Geographic	DPP
149	G4	DPP
150	TechTV	DPP
151	Ovation	DPP
153	BBC America	DPP
154	Trio	DPP
156	Newsworld International	DPP
157	C-SPAN2	DPP
158	C-SPAN3	DPP
162	Discovery Home & Leisure	DPP
164	The Health Network	DPP
165	Style	DPP
166	Do It Yourself	DPP
167	Outdoor Life Network	DPP
168	Outdoor Channel	DPP
169	EWTV	DPP
172	VH1 Classic	DPP
173	MTV2	DPP
174	Fuse	DPP
175	BET on JAZZ	DPP
176	America's Store	DPP
177	NASA Television	DPP
178	FOX Movie Channel	DPP
180	Fine Living	DPP

## NUESTROS CANALES EN DIGITAL

190	SUR	DE
191	CNN en Español	DE
192	Discovery en Español	DE
193	FOX Sports en Español	DE
194	MTV Español	DE
195	MUN2	DE

## DIGITAL MOVIES/PREMIUM

235	HBO on Demand	ICP
236	HBO Latino West	DP
237	HBO Comedy West	DP
238	HBO Zone West	DP
239	HBO Family West	DP
240	HBO West	DP
241	HBO2 West	DP
242	HBO Signature West	DP
243	HBO (HDTV)	HDP
244	HBO Latino	DP
245	HBO Comedy	DP
246	HBO Zone	DP
247	HBO Family	DP
248	HBO	DP
249	HBO2	DP
250	HBO Signature	DP
251	Cinemax	DP
252	MoreMax	DP
253	ActionMax	DP
254	ThrillerMax	DP
255	Wmax	DP
256	@Max	DP
257	5StarMax	DP
258	OuterMax	DP
259	Showtime (HDTV)	HDP
260	Showtime	DP
261	Showtime Too	DP
262	Showtime Showcase	DP
263	Showtime Beyond	DP
264	Showtime Extreme	DP
265	Showtime West	DP
266	Showtime Too West	DP
267	Showtime Women	DP
268	Showtime Beyond West	DP
269	Showtime Next	DP
270	Showtime FamilyZone	DP
271	TMC	DP
272	TMC xtra	DP
273	TMC West	DP
274	TMC xtra West	DP
275	FLUX	DP
276	Encore Action	DP
277	Encore Love Stories	DP
278	Encore Mystery	DP
279	Encore True Stories	DP
280	Encore Westerns	DP
281	Encore	DP
282	Encore WAM West	DP
284	Encore West	DP
285	Encore WAM	DP
286	Independent Film Channel	DP
287	Sundance	DP
288	Starz!	DP
289	Starz! Theater	DP
290	Black Starz!	DP
291	Starz! Family	DP
292	Starz! Cinema	DP
293	Starz! West	DP
294	Starz! Theater West	DP
295	Black Starz! West	DP
296	Starz! Family West	DP
297	Starz! Cinema West	DP
298	MOVIEplex	DP
299	MOVIEplex West	DP

## ICONTROL & DIGITAL IN DEMAND

<b>(DID) PAY PER VIEW</b>		
338	What's On Tonight	ICD
339-350	ICONTROL Movies on Demand	ICD
376	Pay Per View Events 1	DID
377	Pay Per View Events 2	DID
378	ICONTROL Adult	ICD
379	Pleasure	DID
380	Playboy	DID
381	Spice	DID
382	Spice 2	DID

## DIGITAL MUSIC

401	Showcase	DM
402	Today's Country	DM
403	Classic Country	DM
404	Americana	DM
405	Bluegrass	DM
406	R&B and Hip-Hop	DM
407	Classic R&B	DM
408	Smooth R&B	DM
409	Rap	DM
410	Metal	DM
411	Rock	DM
412	Power Rock	DM
413	Classic Rock	DM
414	Alternative Rock	DM
415	Electronica	DM
416	Dance	DM
417	Progressive/Adult Alternative	DM
418	Soft Rock	DM
419	Hit List	DM
420	Party Favorites	DM
421	'80s	DM
422	New Wave	DM
423	'70s	DM
424	Solid Gold Oldies	DM
425	Singers & Standards	DM
426	Big Band & Swing	DM
427	Easy Listening	DM
428	Smooth Jazz	DM
429	Jazz	DM
430	Blues	DM
431	Reggae	DM
432	Soundscapes	DM
433	Classical Masterpieces	DM
434	Opera	DM
435	Light Classical	DM
436	Show Tunes	DM
437	Contemporary Christian	DM
438	Gospel	DM
439	For Kids Only	DM
440	Sounds of the Seasons	DM
441	Musica Latina	DM
442	Salsa y Merengue	DM
443	Rock En Español	DM
444	Latin Love Songs	DM
445	Mexicana	DM

## DIGITAL SPORTS/PREMIUM

500	NBA LP Preview	DSP
501-511	NBA Channel 1-11	DSP
520	ESPN Now	DSP
521-525	PPV Sports 1-5	DSP
541-550	MLB/NHL Channel 1-10	DSP
551	The Tennis Channel	DSK
552	NBA TV	DSK
553	FUEL	DSK

## HIGH DEFINITION

1020	WESH (NBC)	HD
1060	WKMG (CBS)	HD
1090	WFTV (ABC)	HD
1091	WFTV-DT	DT
1135	WOFL (FOX)	HD
1165	WRBW (UPN)	HD
1180	WKCF (WB)	HD
1240	PBS	HD
1243	HBO	HDP
1259	Showtime	HDP
1300	INHD	HDK
1301	INHD2	HDK
1341	Discovery HD Theater	HD

Customer Service (407) 291-2500

B	BASIC	NDP	HIGH DEFINITION PREMIUM
S	STANDARD	NDK	HIGH DEFINITION PAK
P	PREMIUM	ICD	ICONTROL DIGITAL
DE	DIGITAL EN ESPAÑOL	ICP	ICONTROL PREMIUM
DPP	DIGITAL PREMIER PAK	DID	DIGITAL IN DEMAND PPV
DP	DIGITAL PREMIUM	DM	DIGITAL MUSIC
DT	DIGITAL TV	DSP	DIGITAL SPORTS PREMIUM/IN DEMAND PPV
HD	HIGH DEFINITION	DSK	DIGITAL SPORTS PAK



Some services require a SmartBox, Digital SmartBox, DVR or HD SmartBox. All channels not available in all areas.